

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

MAHMOUD KHALIL,

Petitioner,

v.

WILLIAM P. JOYCE, *et al.*,

Respondents.

HON. MICHAEL E. FARBIARZ

Civ. Act. No. 25-cv-1963 (MEF) (MAH)

NOTICE OF MOTION TO STAY
PRELIMINARY INJUNCTION
MODIFICATION ORDER

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, Respondents¹ hereby moves this Court to stay the order entered on July 17, 2025, ECF 355, modifying the preliminary injunction entered on June 11, 2025. *See* ECF 299. In light of the Court's directives regarding actions in the Immigration Court, Respondents request that this motion be briefed and heard as quickly as possible.

Respectfully submitted,

/s/ Alanna T. Duong

ALANNA T. DUONG

Senior Litigation Counsel

Office of Immigration Litigation

General Litigation and Appeals Section

PO Box 878, Ben Franklin Station

Washington, D.C. 20044

alanna.duong@usdoj.gov

BRETT A. SHUMATE
Assistant Attorney General
Civil Division

YAAKOV M. ROTH
Principal Deputy Assistant Attorney General

DREW C. ENSIGN
Deputy Assistant Attorney General

AUGUST E. FLENTJE
Special Counsel for Immigration Litigation

July 18, 2025

Attorneys for Respondents

¹ Respondents are William P. Joyce, Acting Field Office Director of New York, United States Immigration and Customs Enforcement; Caleb Vitello, Acting Director of United States Immigration and Customs Enforcement; Kristi Noem, Secretary of the United States Department of Homeland Security; Pamel Bondi, Attorney General of the United States; Donald J. Trump, President of the United States; Marco Rubio, Secretary of the United States Department of State; and Yolanda Pittman, Warden of Elizabeth Contract Detention Facility.

CERTIFICATE OF SERVICE

I hereby certify that, on July 18, 2025, the foregoing Notice was served upon counsel of record for Petitioner by notice of electronic filing with this Court's CM/ECF system.

/s/ Alanna T. Duong
ALANNA T. DUONG
Senior Litigation Counsel
U.S. Department of Justice